

Bryan Reo

From: Bryan Reo
Sent: Thursday, September 22, 2022 12:59 PM
To: Raymond Vasvari
Subject: RE: Reo v Reynaud [Discovery Concerns and pending motion for Protective Order]

Very well.

You may file the stipulation and please furnish me the documents.

I agree not to utilize them outside of these proceedings, in accordance with the order, and to proceed per the terms of the order.

From: Raymond Vasvari <vasvari@vasvarilaw.com>
Sent: Thursday, September 22, 2022 12:58 PM
To: Bryan Reo <reo@reolaw.org>
Subject: Re: Reo v Reynaud [Discovery Concerns and pending motion for Protective Order]

The same as if it were subject to the Order.

From: Bryan Reo <reo@reolaw.org>
Date: Thursday, September 22, 2022 at 12:55 PM
To: Raymond Vasvari <vasvari@vasvarilaw.com>
Subject: RE: Reo v Reynaud [Discovery Concerns and pending motion for Protective Order]

What would my obligation to destroy them entail? Destroy them without accessing them? Destroy them without using them in the case?

If the order is not entered, destroy them immediately? Destroy them at the conclusion of the case?

From: Raymond Vasvari <vasvari@vasvarilaw.com>
Sent: Thursday, September 22, 2022 12:54 PM
To: Bryan Reo <reo@reolaw.org>
Subject: Re: Reo v Reynaud [Discovery Concerns and pending motion for Protective Order]

You also agree to the addendum?

Once we agree we should file this.

I am prepared to provide financial documents designated as confidential once the Order is entered.

I may produce them in advance subject to your agreement to destroy them if the order is not entered.

Yours sincerely,

Raymond V. Vasvari, Jr.

Vasvari | Zimmerman
attorneys & counselors-at-law

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From: Bryan Reo <reo@reolaw.org>
Date: Thursday, September 22, 2022 at 12:43 PM
To: Raymond Vasvari <vasvari@vasvarilaw.com>
Subject: RE: Reo v Reynaud [Discovery Concerns and pending motion for Protective Order]

I will agree to that document, provided in the attachment, as it presently is, in the state you have provided. Please submit it and then furnish me the documents.

From: Raymond Vasvari <vasvari@vasvarilaw.com>
Sent: Thursday, September 22, 2022 12:35 PM
To: Bryan Reo <reo@reolaw.org>
Subject: Re: Reo v Reynaud [Discovery Concerns and pending motion for Protective Order]

Mr. Reo:

Here are my markups on the proposed stipulated protective order.

I see you have made only a few changes and those appear inadvertent.

You have omitted the text of the 3 footnotes in the original. I have read them.
You have omitted the attached Exhibit A that is the Acknowledgement and Agreement to be Bound. I as that we read it.

I would suggest only one addition: that we be expressly permitted to use designated materials in connection with dispositive motions. I have highlighted a suggested addition in Section 5(b).

I have financial records waiting, once this is filed, and will designate them according to the order.

Tax records such as they are have been provided to me, but you should know that EU staff members do not apparently pay what we would think of as income tax in their work countries, but I am told instead pay a direct payroll tax to the EU.

I am collecting and organizing material responsive to your other requests, as outlined in your emails of 21 SEP 2022 (at 10:40 and 08:59 EDT) and 20 SEP 2022 (at 12:11 EDT).

I have an answer to your requests to withdraw certain discovery requests as stated in your email dated 17 SEP 2022 (at 17:46 EDT). I will provide that after I get you these materials. The short answer is that I think you have directly put your mental state at issue in the Complaint, but am prepared to discuss temporal limitations on look back periods in any effort to move discovery along.

Yours sincerely,

Raymond V. Vasvari, Jr.

Vasvari | Zimmerman
attorneys & counselors-at-law

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From: Bryan Reo <reo@reolaw.org>
Date: Thursday, September 22, 2022 at 12:04 PM
To: Raymond Vasvari <vasvari@vasvarilaw.com>